

Comments of MegaZone

First off, lest there be any confusion, my full legal name is indeed MegaZone. Yes, I have an unusual mononym, but it is what it is.

The purpose of this comment is to support TiVo's application for a waiver of Sections 15.118(b), 15.123(b)(1) and 15.123(c) with respect to its pending TiVo Premiere Elite product. I'm a tech blogger (GizmoLovers.com) and a long time follower of the industry and the FCC's rule makings. I'm familiar with analog and digital broadcast technologies, Switched Digital Video (SDV), Tuning Adapters, CableCARD, Uni-directional Digital Cable Products (UDCPs), OCAP/tru2way, IPTV, and many other related technologies.

I've been a TiVo user since 2002, and my main DVR is currently a TiVo Series3 HD model. I've had personal experience with everything from the original TiVo Series1 to the current TiVo Premiere Series4. My S3 unit receives content from Charter Communications in Worcester, MA, utilizing CableCARD and a Tuning Adapter, as SDV is used extensively in my area.

As a consumer I would be very interested in upgrading to the TiVo Premiere Elite four-tuner DVR. And while Charter still has a handful of analog-only channels in my service area (roughly 20), the bulk of their offering is available via digital service and they continue to transition channels. I expect the remaining analog channels will be available digitally before long. In the meantime, I'd be more than willing to exchange access to those few channels for use of an advanced, four-tuner digital DVR.

As a tech blogger and industry watcher, I fully support TiVo's efforts to bring such a product to market. While the rules requiring analog support made sense in 2003, they do not in today's market. It would be unfair to companies like TiVo to require analog support in retail Digital Cable Ready products when the MVPDs, their primary competition, are able to provide customers with digital-only set top boxes. This create and uneven playing field, as the MSOs are able to benefit from the cost savings and reduction in complexity provided by dispensing with the analog tuners, real-time encoding hardware, associated RAM, etc. Digital only products benefit from a reduced parts count, lower power consumption, and a physically smaller footprint, making them even more appealing to consumers.

I look to the FCC to level the playing field by providing a waiver to TiVo, to allow them to bring this innovative product to market. Analog transmissions are clearly on their way out, and consumer electronics vendors, such as TiVo, need to look to the future, not be mired in the past. Until we have AllVid as the rule of the land, this waiver is the next step forward.

Respectfully submitted,

MegaZone